

CLARK HILL PLLC  
PAOLA M. ARMENI  
Nevada Bar No. 8357  
Email: [parmeni@clarkhill.com](mailto:parmeni@clarkhill.com)  
GIA N. MARINA  
Nevada Bar No. 15276  
Email: [gmarina@clarkhill.com](mailto:gmarina@clarkhill.com)  
1700 S. Pavilion Center Dr., Ste. 500  
Las Vegas, Nevada 89135  
Tel: (702) 862-8300  
Fax: (702) 778-9709  
*Attorneys for Plaintiffs, Perez Family*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

VICTOR PEREZ, as Special Administrator of  
the Estate of CARLOS PEREZ, deceased;  
VICTOR PEREZ, as the Guardia Ad Litem for  
S.E.P., a minor; VICTOR PEREZ, as the Guardia  
Ad Litem for A.I.P., a minor,

Plaintiffs,

vs.

STATE OF NEVADA, ex.rel. NEVADA  
DEPARTMENT OF CORRECTIONS;  
DIRECTOR GREG COX, individually;  
WARDEN DWIGHT NEVEN, individually;  
ASSISTANT WARDEN TIMOTHY FILSON,  
individually; COT. RAMOS, individually;  
LIEUTENANT OLIVER, individually;  
CORRECTIONS OFFICER CASTRO,  
individually; CORRECTIONS OFFICER  
SMITH, individually; and DOES I-X, inclusive;  
and ROES I-X, inclusive,

Defendants.

CASE NO.: 2:15-cv-01572-APG-DJA

**STIPULATION AND ORDER TO  
EXTEND DEADLINE TO FILE  
STIPULATED DISMISSAL**

IT IS HEREBY STIPULATED by and between Victor Perez, as Special Administrator of  
the Estate of Carlos Perez, deceased, by and through his counsel, Paola M. Armeni, Esq., and Gia  
N. Marina, Esq., of the law firm of Clark Hill, Defendant Raynaldo Ramos, by and through his  
counsel, Robert W. Freeman, Jr. Esq., of the law firm of Lewis Brisbois Bisgaard & Smith, LLP,  
Defendants, State of Nevada ex rel Nevada Department of Corrections, James Greg Cox, Timothy  
Filson, Dwight W. Neven and Ronald Oliver, by and through their counsel, Kiel Ireland, Esq. of  
the Attorney General's Office, Defendant Isaiah Smith, by and through his counsel of record  
Jeffrey F. Barr, Esq. and Alina Shell, Esq. of the law firm of Armstrong Teasdale, and Defendant

Jeff Castro, by and through his counsel, Craig Anderson, Esq., of the law firm of Marquis Aurbach, that the deadline to file the Stipulated Dismissal currently August 1, 2023, be continued for an additional sixty (60) days, up to and including September 29, 2023.

APPROVED AS TO FORM AND CONTENT.

Respectfully submitted this 27<sup>th</sup> day of July 2023.

**CLARK HILL, PLLC**

/s/ Paola M. Armeni, Esq.

PAOLA M. ARMENI

Nevada Bar No. 8357

GIA N. MARINA

Nevada Bar No. 15276

1700 S. Pavilion Center Dr. Ste., #500

Las Vegas, Nevada 89135

*Attorneys for Plaintiffs, Perez Family*

**MARQUIS AURBACH**

/s/ Craig R. Anderson, Esq.

Craig R. Anderson, Esq.

Nevada Bar No. 6882

10001 Park Run Drive

Las Vegas, NV 89145

*Attorneys for Defendant Jeffrey Castro*

**ARMSTRONG TEASDALE**

/s/ Alina Shell, Esq.

Jeffrey F. Barr, Esq.

Nevada Bar No. 7269

Alina Shell, Esq.

Nevada Bar No. 11711

3770 Howard Hughes Parkway, Suite 200

Las Vegas, NV 89169

*Attorneys for Defendant Isaiah Smith*

**LEWIS BRISBOIS BISGAARD &  
SMITH LLP**

/s/ Robert W. Freeman, Jr., Esq.

Robert W Freeman, Jr., Esq.

Nevada Bar No. 3062

6385 S. Rainbow Blvd., Ste. 600

Las Vegas, NV 89118

*Attorneys for Defendant Raynaldo Ramos*

**OFFICE OF THE ATTORNEY  
GENERAL**

/s/ Kiel Ireland, Esq.

Kiel Ireland, Esq.

Nevada Bar No. 15368

100 N Carson St

Carson City, NV 89701

*Attorneys for Defendants, State of Nevada,*

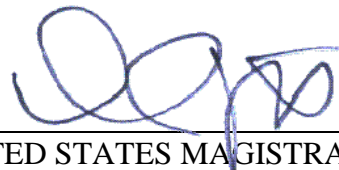
*Dwight W. Neven, James Greg Cox*

*Ronald Oliver, Timothy Filson*

**ORDER**

**IT IS SO ORDERED:**

DATED: July 31, 2023



UNITED STATES MAGISTRATE JUDGE